

Dear Ms Rumrill,

In order that the hearing on the intent to issue a UIC permit to Florence Copper Inc be fair to all parties EPA must present all data available.

In order that the hearing on the intent to issue a UIC permit to Florence Copper Inc. be comprehensive EPA must review all data available prior to the hearing.

At the hearing on 1/22/2015 EPA neglected to inform the public of the amount of the performance bond guarantee nor the amount of the performance of closure and post closure guarantee which they will demand from Florence Copper This information is critical as mining operations have contaminated the drinking water in the past. In fact BHP Pilot Test in 1979 had adverse effects on the quality of the water and still has today adverse effects on the quality of groundwater in Florence, AZ.

Why did EPA neglect to make this critical information available at the hearing? Has EPA now established the amount of the bonds? What is that amount?

At the EPA hearing on 1/22/2015 Ms Rumrill stated that EPA had not reviewed the data from the BHP pilot test program. The obvious starting point to determine the safety of the in-situ mining process would be the data from the previous mining test on the same property. Why did EPA fail to review all pertinent data? In fact the data from BHP is the most significant data to review rather depending on the models developed by your staff which are only on paper and computers.

Had EPA reviewed the BHP data they would have found that the hydraulic control of the sulfuric acid solution failed putting the aquifer in danger of contamination. What will Florence Copper do differently in regard to hydraulic control?

Had EPA reviewed the BHP data they would also have found that BHP in-situ mining process affected the quality of the water. The acceptable water quality standards were exceeded 26 times. In 2012 Florence Copper advised EPA that the total dissolved solids had risen 3 to 12 times higher than alert levels. Contamination is still occurring today.

Please explain to me how EPA can ignore factual data and rely on models drawn up in an office to prove that this in-situ mining process is safe when there is evidence to the contrary.

Sincerely,

Patricia Bishop

